

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:		§ § Case No. 22-60043 § §
FREE SPEECH SYSTEMS, LLC,		
DEBTOR.	§ § Chapter 11 (Subchapter V) §	

WITNESS AND EXHIBIT LIST

Judge:	Hon. Christopher M. Lopez
Hearing Date:	April 28, 2023
Hearing Time:	1:00 p.m. prevailing Central Time
Party's Name:	Shannon & Lee LLP
Attorney's Name:	R. J. Shannon; Kyung S. Lee
Attorney's Phone:	(713) 714-5770
Nature of Proceeding:	Hearing on: <ul style="list-style-type: none"> • Debtor's Motion for Order Approving Settlement [ECF No. 515]

Shannon & Lee LLP (“S&L”) hereby submits this witness and exhibit list in connection with the hearing to be held on Friday, April 28, 2023, at 1:00 p.m. (Central Standard Time) (the “Hearing”).

WITNESSES

S&L may call any of the following witnesses at the Hearing, whether in person or by proffer:

1. Any witness called or designated by any other party; and
2. Any witnesses necessary to rebut the testimony of any witnesses called or designated by any other party.

EXHIBITS

S&L may offer for admission into evidence any of the following exhibits, and any exhibit designated by any other party, at the Hearing:

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
1	Debtor's Motion for Order Approving Settlement [ECF No. 515]				
2	United States Trustee's Objection to Debtor's Motion for Order Approving Settlement [ECF No. 553]				
3	Joinder of the Sandy Hook Families in Support of the United States Trustee's Objection to the Debtor's Motion for Order Approving Settlement [ECF No. 559]				
4	Shannon & Lee LLP's Motion for Order Allowing Administrative Expense Claim and Granting Related Relief [ECF No. 251]				
5	Motion of W. Marc Schwartz and Schwartz Associates LLC for Order Allowing Administrative Expense Claim and Granting Related Relief [ECF No. 252]				
6	United States Trustee's Omnibus Objection to the Motions of Shannon & Lee LLP and W. Marc Schwartz for Orders Allowing Administrative Expense Claims [Dkt. Nos. 251 and 252] [ECF No. 267]				
7	Alex E. Jones Limited Objection to Shannon & Lee LLP, Marc Schwartz and Schwartz Associates, LLC's Motions for Order Allowing Administrative Expense Claim and Granting Related Relief [Doc. #251 and #252] [ECF No. 268]				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
8	The Debtor and Subchapter V Trustee's Joint Objection to W. March Schwartz and Shannon & Lee LLP's Motions for Order Allowing Administrative Expense Claims [ECF No. 269]				
9	Shannon & Lee LLP's Omnibus Reply to Objections to Administrative Expense Motion [ECF No. 362]				
10	Joinder of W. Marc Schwartz and Schwartz Associates, LLC to Shannon & Lee LLP's Omnibus Reply to Objections to Administrative Expense Motion [ECF No. 371]				
11	S&L's Notice of Appeal re Order Denying Debtor's Application to Employ Bankruptcy Co-Counsel [ECF No. 414]				
12	Designation of Record on Appeal and Statement of Issues [ECF No. 471]				
13	Order of District Court in Case No. 23-cv-00461				
14	SALLC's Notice of Appeal and Statement of Election re Order Denying Motion for Rehearing on Debtor's Application to Employ Advisor [ECF No. 415]				
15	Designation of Record on Appeal and Statement of Issues on Appeal [ECF No. 474]				
16	Order of District Court in Case No. 23-cv-00464				
17	S&L's Notice of Appeal re Order Denying Motion for Rehearing on Debtor's Application to Employ Law Firm [ECF No. 416]				

Ex.	Description	Offered	Objection	Admitted /Not Admitted	Disposition
18	Designation of Record on Appeal and Statement of Issues [ECF No. 472]				
19	Order of District Court in Case No. 23-cv-00463				
20	SALLC's Notice of Appeal and Statement of Election re Order (a) Denying Employment of W. Marc Schwartz as Chief Restructuring Officer, (b) Denying Employment of Staff of Schwartz Associates, LLC in Discharge of Duties as Chief Restructuring Officer, and (c) Granting Related Relief [ECF No. 418]				
21	Designation of Record on Appeal and Statement of Issues on Appeal [ECF No. 473]				
22	Order of District Court in Case No. 23-cv-00465				
23	Subchapter V Trustee's Initial Findings of Free Speech Systems, LLC Investigation [ECF No. 549]				
24	November 6, 2022, email from J. Martin to K. Lee, M. Ridulfo, R. Shannon, R. Chapple, and Avi Moshenberg				

S&L reserves the right to supplement, amend or delete any witness and exhibits prior to the Hearing. The S&L also reserves the right to ask the Court to take judicial notice of any document. S&L finally reserves the right to introduce exhibits previously admitted.

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Dated: April 26, 2023

SHANNON & LEE LLP

/s/ R. J. Shannon

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